

JENNER & BLOCK LLP
Reid J. Schar (*pro hac vice*)
RSchar@jenner.com
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: +1 312 222 9350
Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP
Kate Dyer (Bar No. 171891)
kdyer@clarencedyer.com
899 Ellis Street
San Francisco, CA 94109-7807
Telephone: +1 415 749 1800
Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP
Kevin J. Orsini (*pro hac vice*)
korsini@cravath.com
825 Eighth Avenue
New York, NY 10019
Telephone: +1 212 474 1000
Facsimile: +1 212 474 3700

Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**FURTHER SUBMISSION IN
RESPONSE TO QUESTION 2 IN
ORDER FOR FURTHER
RESPONSES RE DIXIE FIRE**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this further submission in response to Question 2 in the Court’s September 14, 2021 order (Dkt. 1470).

Question 2:

As a single exhibit, provide all PG&E (and partner, contractor, etc.) internal emails, texts, memos, and other documents created on July 13 or 14, 2021, pertaining to the July 13 incident on the Bucks Creek 1101 line, and separately summarize them.

PG&E Further Response:

Consistent with PG&E’s September 24, 2021 submission (Dkt. 1479), PG&E is delivering to the Court on September 28, 2021 a thumb drive containing electronic copies of 572 documents bearing Bates PGE-DIXIE-NDCAL-000018126 to PGE-DIXIE-NDCAL-000019165 that PG&E has identified as responsive to this request.¹ These documents include emails, text messages, photographs, videos, maps, and other documents from July 13-14, 2021 that have been collected from Custodians and Mobile Custodians, as well as non-custodial documents, as described in PG&E’s September 24, 2021 submission. *See* Dkt. 1479 at 4-5. PG&E is not able to provide the documents as a single exhibit because the documents are different file types, some of which are produced as PDF images (e.g., .msg and .rmsf files) and some of which are produced in native format (e.g., .jpg, .kml, and .xls files). To facilitate the Court’s review, the thumb drive includes (1) a combined PDF of the entire production, with slipsheets for documents being produced in native format, and (2) an index identifying the Bates range and custodian(s) for each document family in the production.

As set forth in PG&E’s September 24, 2021 submission, certain documents being provided to the Court contain personally identifying information and other confidential information.

¹ As set forth in PG&E’s September 24, 2021 submission, PG&E does not interpret the Court’s question as calling for information protected by the attorney-client privilege or attorney work product protection. Where applicable, PG&E is redacting portions of documents determined to be protected by attorney-client privilege or to constitute attorney work product.

PG&E is in the process of identifying this confidential information and will prepare and deliver a redacted set and file a corresponding administrative motion to seal.

PG&E is continuing to collect and review documents in response to this request, as set forth in its September 24, 2021 submission, and will provide additional documents to the Court on a rolling basis.

Dated: September 28, 2021

Respectfully Submitted,

JENNER & BLOCK LLP

By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

CLARENCE DYER & COHEN LLP

By: /s/ Kate Dyer
Kate Dyer (Bar No. 171891)

Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY